



Puget Sound Energy, Inc.
P.O. Box 97034
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March 24, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: **CG Docket No. 02-278**

Dear Secretary Dortch:

Puget Sound Energy, Inc. (PSE) appreciates the opportunity to provide comments in support of the EEI and AGA petition for an expedited declaratory ruling. This docket requests that the Federal Communications Commission (FCC) confirm that providing a telephone number to an energy utility constitutes "prior express consent" to receive non-telemarketing, informational calls related to the customer's utility service, which are placed using an autodialer or prerecorded voice.

PSE is the largest utility in Washington, serving more than 1.5 million customers in ten counties with safe and dependable natural gas and electricity. As an investor-owned utility, PSE is regulated by the Utilities and Transportation Commission (UTC). In every interaction with our customers, we strive to anticipate their needs and make business doing easy; it is in this spirit that PSE expresses support for the EEI and AGA petition for declaratory ruling.

PSE urges the Commission to issue a comprehensive ruling to exempt utilities from any prior consent requirement in the Telephone Consumer Protection Act (TCPA). While the TCPA is a well-intentioned law that provides for important consumer protection measures, the FCC should confirm that providing a telephone number to an energy utility constitutes "prior express consent" to receive non-telemarketing, informational calls at that number related to the customer's utility service.

When a customer signs up for an account with PSE, they provide their name, address and telephone number. If the customer provides more than one, we ask which number is primary and which is secondary. PSE does not require the customer to specify whether the phone number is a cell or land line, but customers who voluntarily disclose this information typically offer a cell number as the primary contact number. PSE honors the existing federal and state privacy limitations so that we may protect our customers' personal information. However, with an increasing number of customers adopting smartphones and other mobile devices that enable on-the-go business transactions and important communication updates, PSE, like many utilities, is developing a strategy for servicing and communicating with customers where they want, how they want, and when they want.

Specifically, PSE engages customers in the following ways:

1. Critical, service-related issues are communicated to customers via mobile phones.

We anticipate calling 176,000 customers per month to notify them of scheduled outages or other service-related issues and text 25,000 customers per month to advise them their electronic bills are available for viewing.

2. Proactive customer notification and alert programs are emerging in the utility industry as a new way to engage with customers.

We contact customers on their mobile phones for outstanding bill payment or to notify of impending disconnection. PSE initiates phone contact to approximately 473,000 customers per month via phone. Reaching our customers this way is important for a number of reasons. Contacting a customer on their mobile phone about an impending disconnection gives PSE another channel to reach the customer and enable them to make payment arrangements or let us guide them to resources that can help them pay their bill. Additionally, outstanding utility bill payment can negatively impact a customers' credit, so proactively notifying them about a bill payment past due can mitigate the negative credit impact.

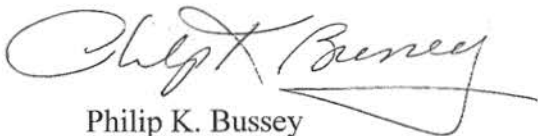
3. Mobile application adoption is growing with PSE customers.

Customers value the ability to engage with PSE via mobile devices. The PSE Mobile Outage Application has been downloaded by approximately 30,000 customers, allowing them to report an outage or gas emergency, access the outage map to find detailed information about updated restoration efforts, and contact us.

If customers are choosing to engage with PSE using their mobile devices, the federal limitation on contacting these customers should be reevaluated. I hope the FCC concludes that our ability to reach customers via their mobile phones is in the public interest, aligns with our mission to provide excellent customer service, and therefore providing a telephone number to an energy utility constitutes "prior express consent."

Thank you for your consideration of PSE's perspective and support for the EEI and AGA petition for an expedited declaratory ruling. Please feel free to contact me at (425) 462-3595 for further information.

Sincerely,



Philip K. Bussey
Senior Vice President &
Chief Customer Officer
Puget Sound Energy